

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
PECOS DIVISION**

**MARY CATHERINE “KATIE”  
SANCHEZ,  
Plaintiff,**

**v.**

**PRESIDIO COUNTY, TEXAS and  
FRANCES GARCIA in her individual  
capacity,  
Defendants**

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**NO. 4:19-CV-00037**

**DEFENDANTS’ PROPOSED VOIR DIRE QUESTIONS**

Defendants Presidio County, Texas and Frances Garcia (collectively, “Defendants”) submit the following Proposed Voir Dire Questions for trial of this matter. Defendants reserve the right to supplement these voir dire questions upon review of Plaintiff’s pretrial submissions.

Respectfully submitted,

JACKSON WALKER L.L.P.  
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By: /s/ Jon Mark Hogg

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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

This is to certify that on the 3<sup>rd</sup> day of May, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notice of such filing to all attorneys of record on file.

/s/ Jon Mark Hogg  
Jon Mark Hogg

**VOIR DIRE QUESTIONS**

1. Has anyone on the panel, or any members of your immediate family, ever been a plaintiff in a lawsuit? If so, please state the nature and circumstances surrounding the situation.
2. Has anyone on the panel, or any members of your immediate family, ever been a defendant in a lawsuit? If so, please state the nature and circumstances surrounding the situation.
3. Do any of you know Ms. Mary Katherine “Katie” Sanchez or her attorney?
4. Is anyone on the panel employed by Presidio County, Texas?
5. Have you or any members of your family ever been employed by Presidio County, Texas?
6. Do you know any person who is or has been employed Presidio County, Texas? If yes, who do you know?
7. Has anyone on the panel, or any members of your immediate family, ever had a dispute with Presidio County, Texas? If so, please explain.
8. Do you or any member of your family have any reason to complain about Presidio County, Texas?
9. Is anyone on the panel familiar with the incident that this case is based on?
10. If the Plaintiff fails to prove her case according to the Court’s instruction, would you have any difficulty turning her away with nothing, even though she was terminated? If so, please explain.
11. Have you or any member of your immediate family ever had any legal training or legal education of any type?
12. Have you or any member of your family ever been a party to a lawsuit?
  - a. If so, what was the nature of the lawsuit?
  - b. Were you or your family member or a close friend a plaintiff in that lawsuit?
  - c. Was a local government a party defendant in that lawsuit?
  - d. Do you feel that experience would make it difficult to be fair and impartial or make it difficult for you to decide this case on the facts and the law as the Court instructs you? If so, please explain.
13. Has any member of the jury panel, or a member of your immediate family, or a close personal acquaintance filed any work related grievance against a present or previous employer? (For affirmative response please ask for details such as when the claim was made, by whom, the nature of the claim, against whom the claim was made, the ultimate disposition of the claim). If so:

- a. Do you feel that as a result of your having filed such grievance against a present or previous employer that you would be predisposed or more inclined to more favorably view the Plaintiff's case and the evidence presented by her or her attorneys? If so, would the fact that you have previously filed a grievance prevent you from rendering a fair and impartial decision based upon all the evidence presented in the case?
14. In this case, Plaintiff claims her job as former Director of the Presidio County Office of Management and Budget was eliminated as retaliation for her decision to run for County Treasurer against Defendant Frances Garcia. Does anyone feel that because of the nature of Plaintiff's claim, or any other reason, you would have any difficulty in rendering a fair and impartial verdict in this case? If so, please explain.
15. Does anyone on the jury panel have any feelings about the judicial system, judges, lawyers, or the appropriateness of the trial of disputes by means of a lawsuit that would affect your acting as a fair and impartial juror in this case? If so, please explain the nature of your feelings.
16. Does anyone on the panel have any feelings or opinions about Presidio County, Texas that would affect your acting as a fair and impartial juror in this case? If so, please explain.
17. The following persons may be called to testify in this case:

Mary Catherine "Katie" Sanchez

Frances Garcia

Loretto Vasquez

Virgie Pallarez

Honorable Presidio County Judge Cinderela Guevara

Brenda Bentley

Elry Aranda

Jose Cabezuela

Do you know any of these persons? If yes, who and how do you know them?